

# EXHIBIT 2

# ALSTON & BIRD

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January 28, 2025

BY EMAIL

Elianne Rivera, City Clerk  
400 Alexandria Blvd  
Oviedo, FL 32765  
[erivera@cityofoviedo.net](mailto:erivera@cityofoviedo.net)

Re: Public Records Request to City of Oviedo, FL

To whom it may concern:

In accordance with the provisions of the Florida Public Records Act, Fla. Stat. §§ 119.01 *et seq.*, I request the following documents that are in the possession, custody, or control of the City of Oviedo, Florida:

1. All documents and other records relating to the City of Oviedo's approval to bring claims against OptumRx, Inc.; Optum, Inc.; OptumInsight, Inc.; OptumInsight Life Sciences, Inc.; OptumRx Discount Card Services, LLC; Optum Perks, LLC; OptumHealth Care Solutions, LLC; OptumHealth Holdings, LLC; Optum Health Networks, Inc.; UnitedHealth Group Incorporated; Express Scripts, Inc.; Express Scripts Administrators, LLC; Medco Health Solutions, Inc.; ESI Mail Order Processing, Inc.; ESI Mail Pharmacy Service, Inc.; Express Scripts Pharmacy, Inc.; Evernorth Health, Inc.; or Express Scripts Specialty Distribution Services, Inc. in the national opioid litigation, *In re Nat'l Prescription Opiate Litig.*, 1:17-md-2804 (N.D. Ohio) and its member cases (the "Opioid Litigation").
2. All documents and other records relating to the City of Oviedo's approval to file any complaint in the Opioid Litigation.
3. All documents and other records relating to the City of Oviedo's approval to amend or supplement its complaint in the Opioid Litigation.
4. All documents and communications relating to any request by any law firm (including, but not limited to Romano Law Group) or by any attorney (including, but not limited to Eric Romano) for approval from the City of Oviedo to sue OptumRx, Inc.; Optum, Inc.; OptumInsight, Inc.; OptumInsight Life Sciences, Inc.; OptumRx Discount Card Services, LLC; Optum Perks, LLC; OptumHealth Care Solutions, LLC; OptumHealth

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Holdings, LLC; Optum Health Networks, Inc.; UnitedHealth Group Incorporated; Express Scripts, Inc.; Express Scripts Administrators, LLC; Medco Health Solutions, Inc.; ESI Mail Order Processing, Inc.; ESI Mail Pharmacy Service, Inc.; Express Scripts Pharmacy, Inc.; Evernorth Health, Inc.; or Express Scripts Specialty Distribution Services, Inc. in the Opioid Litigation.

5. All engagement agreements, engagement letters, memoranda of understanding, memoranda of agreement, letters of intent, contracts, or other agreements (including any amendments, restatements, or modifications to such agreements) that the City of Oviedo entered into with any law firms, attorneys, or other professionals (including, but not limited to Romano Law Group or Eric Romano) to prosecute or assist with the prosecution of the Opioid Litigation or claims against any party or entity.

If you withhold any document responsive to these requests—whether due to a purported privilege, the exemptions in Fla. Stat. ch. 119, or any other legal authority—please state, for each document withheld, the basis for the withholding. Should any document containing responsive material also contain material protected from disclosure by privilege, the exemptions in Fla. Stat. ch. 119, or any other legal authority, please redact the exempted material, clearly state the basis for the redaction, and produce the nonexempted material. In the event the City of Oviedo believes that there are no documents in its possession, custody, or control that are responsive to these requests, please state that expressly.

Please provide written notice and disclosure of responsive records within a reasonable time as required by Fla. Stat. § 119.07. Electronic copies of the responsive records should be sent to [matthew.hooker@alston.com](mailto:matthew.hooker@alston.com) in PDF format.

Thank you for your prompt attention to this matter.

Sincerely,



Matthew P. Hooker